Patricia M. French Senior Attorney



300 Friberg Parkway Westborough, Massachusetts 01581 (508) 836-7394 (508) 836-7039 (facsimile) pfrench@nisource.com

August 15, 2006

BY OVERNIGHT DELIVERY AND E-FILE

Mary L. Cottrell, Secretary Department of Telecommunications and Energy One South Station Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-31

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's responses to the following Information Requests:

UWUA-3-1 UWUA-3-2 UWUA-3-3 UWUA-3-4

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc: Paul Osborne (DTE)
A. John Sullivan (DTE)
Alexander Cochis, Assistant Attorney General (4 copies)
Charles Harak, Esq. (UWUA)
Nicole Horberg Decter, Esq. (USW)
Service List

RESPONSE OF BAY STATE GAS COMPANY TO THE THIRD SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273 D.T.E. 06-31

Date: August 15, 2006

Responsible: Stephen H. Bryant, President

UWUA 3-1: Please describe the respective roles that individuals at Bay State (e.g., Steve Bryant, Dan Cote, and those serving under them) and/or NiSource or NSCS employees or consultants play in determining the annual level of investment in replacement of pipe on Bay State's distribution system. Include the names and titles of the individuals involved, and the role that each individual plays.

RESPONSE: The amount of pipe that is replaced each year as part of Bay State's nondiscretionary capital spending initiatives is primarily driven by two factors: the Company's plan to replace all remaining bare and coated, unprotected steel over the next 14 years, and the Company's compliance with the Department's cast iron replacement program. These two factors result in a highly predictable amount of pipe that will be replaced each year. The engineering staff determines the specific segments of bare and coated, unprotected pipe that will be replaced in a given geographical area, and replacement of cast iron pipe is determined primarily by the amount and location of municipal street reconstruction. Ultimately, the annual level of investment is driven by these factors and the cost of construction work performed by contractors secured through competitive bidding. Therefore, the role that both Bay State and NCSC senior management play with regard to these non-discretionary initiatives is to authorize the spending of necessary capital dollars and ensure these funds are managed in a prudent manner through competitive bidding processes and general oversight.

Keith Dalton, Manager of Engineering & Construction, has primary responsibility for overseeing the selection of facilities to be replaced each year. Mr. Dalton reports to Shawn Patterson, Vice President of Engineering.

RESPONSE OF BAY STATE GAS COMPANY TO THE THIRD SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273 D.T.E. 06-31

Date: August 15, 2006

Responsible: Stephen H. Bryant, President

UWUA 3-2: Please describe the respective roles that individuals at Bay State (e.g., Steve Bryant, Dan Cote, and those serving under them) and/or NiSource or NSCS employees or consultants play in determining the annual level of investment in leak detection and repair on Bay State's distribution system. Include the names and titles of the individuals involved, and the role that each individual plays.

RESPONSE: Bay State's decision-making process for determining the annual level of leak detection and repair investment does not involve much management discretion, since the primary drivers are the leakage surveys required by the Federal (49 CFR Part 192) and State (CMR 220) pipeline safety codes and the Company's long-standing policy to repair most Class 2 leaks before the end of each calendar year. The Federal and State codes require local distribution companies such as Bay State to, among other things, undertake certain periodic leakage surveys and prescribe how companies respond to certain types of leaks (i.e., Class 1 leaks require immediate repair, Class 2 leaks require repair within a certain time frame and Class 3 leaks require monitoring).¹

Given that the code requirements for leak surveying have been in place for many years and the fact that Bay State's system incurs only modest growth each year, the Company's cost to perform leak detection is fairly predictable. Accordingly, Bay State's annual leak detection budget is developed by taking the actual leak detection expenditures from the previous year and adjusting as necessary for expected inflation and for any known anomalies.

The annual level of investment in leak repair is dictated by the number and type of leaks that are identified each year.

The following is a list of Bay State's management engaged in the leak detection and repair budgeting process:

Periodically, it may also be necessary for the Company to undertake additional leak surveys when viewed as necessary by management. This occurrence, which is rare, may arise under extra-ordinary circumstances that produce a special risk (e.g., a very cold winter resulting in deep frost conditions or other unusual ground movement).

Bay State Gas Company D.T.E. 06-31 UWUA-3-2 Page 2 of 2

Dan Cote – BSG General Manager
Bill St. Cyr – OCM* Brockton
Colin Nesbit – Budget Analyst/IBM - Financial Support Group

* OCM = Operations Center Manager.

RESPONSE OF BAY STATE GAS COMPANY TO THE THIRD SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273 D.T.E. 06-31

Date: August 15, 2006

Responsible: Stephen H. Bryant, President

- UWUA 3-3: (a) Please provide a table listing the month-by-month investments (\$) in replacement of gas mains and services on Bay State's system, for the period January 2005 to the most recent date available.
 - (b) Please provide a table listing the month-by-month leak rates on Bay State's system, for the period January 2005 to the most recent date available. To the extent available, include data by category of the leak (1, 2 or 3), sorted by mains v. services, and sorted by division (Brockton, Springfield, Lawrence).

RESPONSE:

- (a) Please see Attachment UWUA-3-3 (A) for the requested information. A review of the data demonstrates that Bay State continues to replace its mains and services at a level consistent with expectations set forth in Docket D.T.E. 05-27.
- (b) Please see Attachment UWUA-3-3 (B) for the requested information.

BAY STATE GAS COMPANY REPLACEMENT MAINS AND SERVICES JANUARY 2005 TO DECEMBER 2005

	Jan 2005	Feb 2005	Mar 2005	Apr 2005	May 2005	Jun 2005	Jul 2005	Aug 2005	Sep 2005	Oct 2005	Nov 2005	Dec 2005	YEAR END TOTAL
Replacement Mains													
Dollars 1/	\$442,785	\$85,683	\$259,850	\$693,484	\$1,411,466	\$2,186,943	\$1,790,613	\$2,591,790	\$2,485,922	\$2,068,120	\$1,381,666	\$2,389,394	\$17,787,716
Replacement Resid Serv													
Dollars 1/	\$190,886	\$158,333	\$169,526	\$321,586	\$380,614	\$387,229	\$446,568	\$592,011	\$474,015	\$563,538	\$405,350	\$769,899	\$4,859,555
Replacement C&I Serv													
Dollars 1/	(\$4,580)	\$15,380	(\$470)	\$10,592	\$20,066	\$4,326	\$5,695	\$20,065	\$5,089	\$3,050	\$8,839	\$35,121	\$123,173
Total Mains & Services	\$629,091	\$259,396	\$428,906	\$1,025,662	\$1,812,146	\$2,578,498	\$2,242,876	\$3,203,866	\$2,965,026	\$2,634,708	\$1,795,855	\$3,194,414	\$22,770,444

NOTES: 1/ These capital expenditures represent direct charges for replacement mains and services only. No overheads have been applied.

Bay State gas Company D.T.E. 06-31 Attachment UWUA-3-3 (A) Page 2 of 2

BAY STATE GAS COMPANY REPLACEMENT MAINS AND SERVICES JANUARY 2006 TO JUNE 2006

	Jan 2006	Feb 2006	Mar 2006	Apr 2006	May 2006	Jun 2006	6 MONTH TOTAL
Replacement Mains							
Dollars 1/	\$770,997	\$247,971	\$511,206	\$741,067	\$1,741,485	\$2,122,160	\$6,134,886
Replacement Resid Serv							
Dollars 1/	\$383,718	\$155,229	\$217,445	\$298,213	\$372,434	\$464,217	\$1,891,256
Replacement C&I Serv							
Dollars 1/	\$5,387	\$4,129	\$2,419	\$3,880	\$4,453	\$14,617	\$34,885
Total Mains & Services S	\$1,160,102	\$407,329	\$731,070	\$1,043,160	\$2,118,372	\$2,600,994	\$8,061,027

NOTES: 1/ These capital expenditures represent direct charges for replacement mains and services only. No overheads have been applied.

BAY STATE GAS COMPANY MAINS AND SERVICES LEAK DATA JANUARY 2005 - JUNE 2006

		Brockton Class		5	Springfield Class		Lawrence Class		
MAINS	1 1	2	3	1	2	3	1	2	3
Jan-05	20	58	1	13	7	21	14	31	2
Feb-05	20	67	3	24	19	18	6	29	0
Mar-05	17	41	1	15	13	13	8	23	1
Apr-05	10	37	1	11	6	5	1	41	0
May-05	13	42	5	9	22	26	7	42	0
Jun-05	10	33	5	13	22	20	11	55	1
Jul-05	15	22	6	5	12	10	4	38	0
Aug-05	19	24	10	6	14	18	3	16	0
Sep-05	8	24	0	7	18	20	5	21	2
Oct-05	24	29	1	10	7	4	24	1	0
Nov-05	23	70	0	8	7	2	6	23	1
Dec-05	29	63	3	10	5	2	10	35	0
Jan-06	21	55	1	24	18	15	8	25	0
Feb-06	16	42	1	13	15	5	11	26	0
Mar-06	10	55	1	21	35	22	11	29	3
Apr-06	5	30	0	7	5	7	5	28	3
May-06	10	28	0	12	11	10	6	37	16
Jun-06	21	35	0	20	21	1	4	23	11
Jul-06	6	37	1	9	19	9	10	0	0
		Brockton			Springfield			Lawrence	
		Class			Class			Class	
Services	4	_	^	4	•	•	4		•
	1	2	3	1	2	3	1	2	3
Jan-05	41	16	9	21	4	18	5	11	1
Jan-05 Feb-05	41 28	16 18	9 6	21 29	4 22	18 24	5 9	11 10	1 0
Jan-05 Feb-05 Mar-05	41 28 34	16 18 11	9 6 2	21 29 41	4 22 12	18 24 13	5 9 5	11 10 7	1 0 3
Jan-05 Feb-05 Mar-05 Apr-05	41 28 34 43	16 18 11 10	9 6 2 6	21 29 41 38	4 22 12 9	18 24 13 5	5 9 5 9	11 10 7 12	1 0 3 0
Jan-05 Feb-05 Mar-05 Apr-05 May-05	41 28 34 43 50	16 18 11 10 12	9 6 2 6 37	21 29 41 38 48	4 22 12 9 17	18 24 13 5 25	5 9 5 9	11 10 7 12 21	1 0 3 0 1
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05	41 28 34 43 50 45	16 18 11 10 12 17	9 6 2 6 37 25	21 29 41 38 48 27	4 22 12 9 17 28	18 24 13 5 25 21	5 9 5 9 6 14	11 10 7 12 21 54	1 0 3 0 1 12
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05	41 28 34 43 50 45	16 18 11 10 12 17	9 6 2 6 37 25 91	21 29 41 38 48 27	4 22 12 9 17 28 15	18 24 13 5 25 21	5 9 5 9 6 14	11 10 7 12 21 54 34	1 0 3 0 1 12 14
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05	41 28 34 43 50 45 32	16 18 11 10 12 17 12 17	9 6 2 6 37 25 91 40	21 29 41 38 48 27 22	4 22 12 9 17 28 15	18 24 13 5 25 21 10	5 9 5 9 6 14 11	11 10 7 12 21 54 34	1 0 3 0 1 12 14
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05	41 28 34 43 50 45 32 47 57	16 18 11 10 12 17 12 17 6	9 6 2 6 37 25 91 40 26	21 29 41 38 48 27 22 18	4 22 12 9 17 28 15 16	18 24 13 5 25 21 10 19	5 9 5 9 6 14 11 9	11 10 7 12 21 54 34 10	1 0 3 0 1 12 14 8
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05	41 28 34 43 50 45 32 47 57	16 18 11 10 12 17 12 17 6 15	9 6 2 6 37 25 91 40 26	21 29 41 38 48 27 22 18 25 32	4 22 12 9 17 28 15 16 17	18 24 13 5 25 21 10 19 20	5 9 5 9 6 14 11 9	11 10 7 12 21 54 34 10 2	1 0 3 0 1 12 14 8 0
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05 Nov-05	41 28 34 43 50 45 32 47 57 46	16 18 11 10 12 17 12 17 6 15 24	9 6 2 6 37 25 91 40 26 22 27	21 29 41 38 48 27 22 18 25 32	4 22 12 9 17 28 15 16 17 2	18 24 13 5 25 21 10 19	5 9 5 9 6 14 11 9 9	11 10 7 12 21 54 34 10 2 7	1 0 3 0 1 12 14 8
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05 Nov-05 Dec-05	41 28 34 43 50 45 32 47 57 46 66 46	16 18 11 10 12 17 12 17 6 15 24	9 6 2 6 37 25 91 40 26 22 27	21 29 41 38 48 27 22 18 25 32 34	4 22 12 9 17 28 15 16 17 2 8	18 24 13 5 25 21 10 19 20 4	5 9 5 9 6 14 11 9 9 4	11 10 7 12 21 54 34 10 2 7	1 0 3 0 1 12 14 8 0 0
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05 Nov-05 Dec-05 Jan-06	41 28 34 43 50 45 32 47 57 46 66 46	16 18 11 10 12 17 12 17 6 15 24 22 20	9 6 2 6 37 25 91 40 26 22 27 10 41	21 29 41 38 48 27 22 18 25 32 34 29	4 22 12 9 17 28 15 16 17 2 8 6	18 24 13 5 25 21 10 19 20 4 1	5 9 5 9 6 14 11 9 9 4 10 7	11 10 7 12 21 54 34 10 2 7 5 5	1 0 3 0 1 12 14 8 0 0 1 1
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05 Nov-05 Dec-05 Jan-06 Feb-06	41 28 34 43 50 45 32 47 57 46 66 46 43 23	16 18 11 10 12 17 12 17 6 15 24 22 20 25	9 6 2 6 37 25 91 40 26 22 27 10 41 25	21 29 41 38 48 27 22 18 25 32 34 29 27	4 22 12 9 17 28 15 16 17 2 8 6	18 24 13 5 25 21 10 19 20 4 1 4	5 9 5 9 6 14 11 9 9 4 10 7	11 10 7 12 21 54 34 10 2 7	1 0 3 0 1 12 14 8 0 0
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05 Nov-05 Dec-05 Jan-06 Feb-06 Mar-06	41 28 34 43 50 45 32 47 57 46 66 46	16 18 11 10 12 17 12 17 6 15 24 22 20	9 6 2 6 37 25 91 40 26 22 27 10 41 25 51	21 29 41 38 48 27 22 18 25 32 34 29	4 22 12 9 17 28 15 16 17 2 8 6	18 24 13 5 25 21 10 19 20 4 1	5 9 5 9 6 14 11 9 9 4 10 7	11 10 7 12 21 54 34 10 2 7 5 5 5	1 0 3 0 1 12 14 8 0 0
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05 Nov-05 Dec-05 Jan-06 Feb-06	41 28 34 43 50 45 32 47 57 46 66 46 43 23	16 18 11 10 12 17 12 17 6 15 24 22 20 25	9 6 2 6 37 25 91 40 26 22 27 10 41 25	21 29 41 38 48 27 22 18 25 32 34 29 27 36	4 22 12 9 17 28 15 16 17 2 8 6 18 15	18 24 13 5 25 21 10 19 20 4 1 4 8 2	5 9 5 9 6 14 11 9 9 4 10 7 10 6	11 10 7 12 21 54 34 10 2 7 5 5 5 19 8	1 0 3 0 1 12 14 8 0 0 1 1 1 1 3 2
Jan-05 Feb-05 Mar-05 Apr-05 May-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05 Nov-05 Dec-05 Jan-06 Feb-06 Mar-06 Apr-06	41 28 34 43 50 45 32 47 57 46 66 46 43 23 32	16 18 11 10 12 17 12 17 6 15 24 22 20 25 12	9 6 2 6 37 25 91 40 26 22 27 10 41 25 51	21 29 41 38 48 27 22 18 25 32 34 29 27 36 17	4 22 12 9 17 28 15 16 17 2 8 6 18 15 27	18 24 13 5 25 21 10 19 20 4 1 4 8 2 23	5 9 5 9 6 14 11 9 9 4 10 7 10 6	11 10 7 12 21 54 34 10 2 7 5 5 5 19 8	1 0 3 0 1 12 14 8 0 0 1 1 1 3 2 1 1

RESPONSE OF BAY STATE GAS COMPANY TO THE THIRD SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273 D.T.E. 06-31

Date: August 15, 2006

Responsible: Stephen H. Bryant, President

UWUA 3-4: [See response DTE-BSG 1-13] Provide a set of similar "Current staffing level" tables, but showing staffing levels for January 1 and June 30 for the years 2004 and 2005, and for January 1, 2006.

RESPONSE: Please see Attachment UWUA-3-4 for a listing of the Company's full-time employees by division and business function for the requested time periods.

	Brockton	Springfield	Lawrence	Westboro	Total MA
Distribution	61	55	12		128
Meter	17	14	12		43
Customer Service	48	27	10		85
Admin	1	1	1	1	4
Northern Management	0				0
Total Field Operations	127	97	35	1	260
				,	
System Operations	14	12	3	1	30
Facilities	1	3		3	7
Meter Shop Instrumentation	0 2	8 1		1	8 4
Construction	2	1		1	4
Operations Exec Admin	0			3	3
Total Other Operations	19	25	3	9	<u>56</u>
Total Other Operations	10	20		•	30
OPERATIONS TOTALS	146	122	38	10	316
Tech Ops -GIS - Maps	2	1	1		4
Engineering	2	3		4	9
Total Tech Ops	4	4	1	4	13
Dispatch	10				10
Scheduling	3	3	1		7
Data Entry	3				3
Supports Ops Admin				1	1
Total Support Operations	16	3	1	1	21
Meter Reading	8	9	5		22
Field Collections	10	4	3		17
Total Meter to Cash	18	13	<u>8</u>	0	39
Total Meter to Gash	10	10		•	33
President & Regulatory Affairs	0				0
Communications	0				0
CARES	0			1	1
DSM _	0			3	3
Total President & Staff	0	0	0	4	4
Call Center		58			58
Billing	22	36			22
Revenue Recovery	22	8			8
NE Retail & Sales Svcs	2	0		1	3
Sales Key Accounts	2			1	0
Fleet	4	4			8
Stores	4	4	2		10
Energy Supply	7	1	_		1
Human Resources		•		1	1
Total Other	32	75	2	2	110
TOTAL 0047'0'	040	0.4=	F0	-	500
TOTAL LOCATION	216	217	50	21	503

Bay State Gas Company Full Time Staffing Levels by Division As of June 30, 2004

	Brockton	Springfield	Lawrence	Westboro	Total MA
Distribution	65	53	13		131
Meter	16	19	11		46
Customer Service	56	28	13		97
Admin	1	1	1	1	4
Northern Management					0
Total Field Operations	138	101	38	1	278
System Operations	16	15	3	1	35
Facilities	1	3		3	7
Meter Shop		7			7
Instrumentation	2	1			3
Construction	2	1	1	1	5
Operations Exec Admin				3	3
Total Other Operations	21	27	4	8	60
OPERATIONS TOTALS	159	128	42	9	338
Tech Ops -GIS - Maps	2		1		3
Engineering	3	3		4	10
Total Tech Ops	5	3	1	4	13
Dispatch	11				11
Scheduling	2	3	1		6
Data Entry	3				3
Supports Ops Admin	4	3		1	8
Total Support Operations	20	6	1	1	28
Meter Reading	4	5	3		12
Field Collections	6	4	3		13
Total Meter to Cash	10	9	6	0	25
President & Regulatory Affairs	0				0
Communications	0				0
CARES	0			1	1
DSM	0			3	3
Total President & Staff	0	0	0	4	4
Call Center		64			64
Billing	21				21
Revenue Recovery		10			10
NE Retail & Sales Svcs	2	1		1	4
Sales Key Accounts					0
Fleet	4	4			8
Stores	4	5	2		11
Energy Supply		1			1
Human Resources					0
Total Other	31	85	2	1	119
TOTAL LOCATION	225	231	52	19	527

Bay State Gas Company Full Time Staffing Levels by Division As of December 31, 2004

Distribution 77		Brockton	Springfield	Lawrence	Westboro	Total MA
Meter	Distribution	77	54	13		144
Customer Service 59 29 14 102 Admin 1 1 1 1 4 Northern Management 150 99 40 1 290 System Operations 16 12 3 1 32 Facilities 1 3 3 7 7 Meter Shop 8 8 8 1 3 3 7 7 6 6 6 9 4 1 3 2 1 3 3 7 7 8 8 8 8 1 3 3 7 8 8 8 1 3 2 1 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 4 4 4 4 4 4 4 4 4 4 4 1 4						
Northern Management						
Total Field Operations 150 99 40 1 290 System Operations 16 12 3 1 32 Facilities 1 3 3 7 Meter Shop 8 8 8 Instrumentation 2 1 3 3 Construction 3 2 1 6 6 Operations Exec Admin 3 2 1 6 5 OPERATIONS TOTALS 172 124 44 9 349 Tech Ops -GIS - Maps 2 1 1 4 4 9 349 Tech Ops -GIS - Maps 2 1 1 4 4 9 349 Tech Ops -GIS - Maps 2 1 1 4 4 10 14 4 10 14 4 10 14 14 10 14 11 14 14 11 14 14 14 14 14		1	1	1	1	4
System Operations	Northern Management					0
Facilities	Total Field Operations	150	99	40	1	290
Facilities	System Operations	16	12	3	1	32
Meter Shop				Ü	· ·	
Instrumentation 2		·			•	
Construction 3	•	2			1	
Total Other Operations 22 25 4 8 59	Construction	3	2	1		
Tech Ops -GIS - Maps	Operations Exec Admin				3	
Tech Ops -GIS - Maps 2 1 1 4 Engineering 3 3 0 4 10 Total Tech Ops 5 4 1 4 14 Dispatch 14 14 14 14 Scheduling 3 3 1 7 Data Entry 3 3 1 7 Data Entry 3 3 1 9 Total Support Operations 25 6 1 1 33 Meter Reading 4 5 3 12 9 Total Support Operations 25 6 1 1 33 Meter Reading 4 5 3 12 2 Field Collections 6 6 6 3 15 15 Total Meter to Cash 10 11 6 0 227 President & Regulatory Affairs 0 0 0 0 0 0	Total Other Operations	22	25	4	8	59
Total Tech Ops S	OPERATIONS TOTALS	172	124	44	9	349
Total Tech Ops S	-					
Total Tech Ops 5 4 1 4 14 Dispatch 14	·			1		
Dispatch 14 14 14 14 14 14 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 8 1 9 7 7 1 9 3 1 9 9 3 3 1 9 9 9 1 1 9 3 3 1 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 1 1 5 5 3 1 1 5 3 1 1 1 5 3 1						
Scheduling 3 3 1 7 Data Entry 3 3 1 9 Total Support Operations 25 6 1 1 33 Meter Reading 4 5 3 12 Field Collections 6 6 3 15 Total Meter to Cash 10 11 6 0 27 President & Regulatory Affairs 0 0 27 President & Regulatory Affairs 0 0 0 27 President & Regulatory Affairs 0 4 4 4 4 4 4 4 4 4 4 4 4 2 1 1 5 3 1 1 1	Total Tech Ops	5	4	1	4	14
Scheduling 3 3 1 7 Data Entry 3 3 1 9 Total Support Operations 25 6 1 1 33 Meter Reading 4 5 3 12 Field Collections 6 6 3 15 Total Meter to Cash 10 11 6 0 27 President & Regulatory Affairs 0 0 27 President & Regulatory Affairs 0 0 0 27 President & Regulatory Affairs 0 4 4 4 4 4 4 4 4 4 4 4 4 2 1 1 5 3 1 1 1	Dispatch	14				14
Data Entry 3 3 Supports Ops Admin 5 3 1 9 Total Support Operations 25 6 1 1 33 Meter Reading 4 5 3 12 Field Collections 6 6 6 3 15 Total Meter to Cash 10 11 6 0 27 President & Regulatory Affairs 0 0 0 27 President & Regulatory Affairs 0 0 0 0 0 CARES 0 0 0 0 0 0 0 0 0 0 0 0 0 0 4 4 4 4 4 4 4 4 4 4 4 4 2 1 1 5 3 1 1 1 5 3 1 1 1 1 1 2 1 1 1 1 1			3	1		7
Total Support Operations 25 6 1 1 33 Meter Reading 4 5 3 12 Field Collections 6 6 6 3 15 Total Meter to Cash 10 11 6 0 27 President & Regulatory Affairs 0 4 4 4 4 4 4 4 4 4 4 4 4 4 2 1 1 5 5 3 1 1 1 5 5 3 1 1 1 5 5 3 1 1 1 5 5 3 1 1 1 5 5 3 1 1 1 1 1 1 1 1 1 <td< td=""><td>=</td><td>3</td><td></td><td></td><td></td><td>3</td></td<>	=	3				3
Meter Reading 4 5 3 12 Field Collections 6 6 3 15 Total Meter to Cash 10 11 6 0 27 President & Regulatory Affairs 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 2 1	Supports Ops Admin	5	3		1	9
Field Collections 6 6 3 15 Total Meter to Cash 10 11 6 0 27 President & Regulatory Affairs 0 4 4 4 4 4 4 4 4 4 4 4 4 4 2 1 1 5 5 1 <td< td=""><td>Total Support Operations</td><td>25</td><td>6</td><td>1</td><td>1</td><td>33</td></td<>	Total Support Operations	25	6	1	1	33
Field Collections 6 6 3 15 Total Meter to Cash 10 11 6 0 27 President & Regulatory Affairs 0 4 4 4 4 4 4 4 4 4 4 4 4 4 2 1 1 5 5 1 <td< td=""><td>Meter Reading</td><td>4</td><td>5</td><td>3</td><td></td><td>12</td></td<>	Meter Reading	4	5	3		12
Total Meter to Cash 10 11 6 0 27 President & Regulatory Affairs 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 4 4 4 4 4 0 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>						
President & Regulatory Affairs 0 0 Communications 0 0 CARES 0 1 1 DSM 0 3 3 Total President & Staff 0 0 0 4 4 Call Center 64 64 64 Billing 21 21 21 Revenue Recovery 9 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 10 Energy Supply 1 1 1 Human Resources 0 0 1 123					0	
Communications 0 0 CARES 0 1 1 DSM 0 3 3 Total President & Staff 0 0 0 4 4 Call Center 64 64 64 Billing 21 21 21 Revenue Recovery 9 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 2 10 Energy Supply 1 1 1 Human Resources 0 0 1 123	-					
CARES DSM 0 1 1 1 DSM 0 0 3 3 3 Total Other 0 0 4 4 Call Center 64 64 64 Billing 21 21 Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 2 1 1						
DSM 0 3 3 Total President & Staff 0 0 4 4 Call Center 64 64 64 Billing 21 21 21 Revenue Recovery 9 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 12 1 1 Stores 4 4 2 10 1		_				
Total President & Staff 0 0 4 4 Call Center 64 64 Billing 21 21 Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 12 1 1 Stores 4 4 2 10 1 Energy Supply 1 1 1 1 Human Resources 0 0 2 1 123						
Call Center 64 64 Billing 21 21 Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1	_		•	•		3
Billing 21 21 Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 Total Other 35 85 2 1 123	Total President & Stall	U	0	0	4	4
Billing 21 21 Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 Total Other 35 85 2 1 123	Call Center		64			64
Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0		21				
NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0 Total Other 35 85 2 1 123	=		9			9
Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0 Total Other 35 85 2 1 123		3	1		1	5
Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 Total Other 35 85 2 1 123	Sales Key Accounts		1			1
Energy Supply 1 1 1 Human Resources Total Other 35 85 2 1 123			5			
Human Resources 0 Total Other 35 85 2 1 123		4	4	2		10
Total Other 35 85 2 1 123			1			
	_					
TOTAL LOCATION 247 230 54 19 550	Total Other	35	85	2	1	123
	TOTAL LOCATION	247	230	54	19	550

Bay State Gas Company Full Time Staffing Levels by Division As of June 30, 2005

Distribution 79 53 13 145 Meter 17 24 14 555 Customer Service 56 29 13 98 Admin 1 1 1 1 1 1 Northern Management		Brockton	Springfield	Lawrence	Westboro	Total MA
Meter	Distribution	79	53	13		145
Admin	Meter			14		
Northern Management	Customer Service	56	29	13		98
Total Field Operations 153 107 41 1 302 System Operations 16 12 2 1 31 Facilities 1 3 3 7 Meter Shop 8 8 8 Instrumentation 1 1 1 Construction 3 2 1 6 Operations Exec Admin 3 2 1 6 Operations Exec Admin 3 3 8 56 OPERATIONS TOTALS 173 132 44 9 358 Tech Ops -GIS - Maps 3 1 1 5 5 Engineering 3 3 1 1 5 5 Tech Ops -GIS - Maps 3 1 1 5 5 6 Tech Ops -GIS - Maps 3 1 1 4 9 358 Tech Ops -GIS - Maps 3 3 1 7 1 <td></td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> <td>4</td>		1	1	1	1	4
System Operations		_				
Facilities	Total Field Operations	153	107	41	1	302
Facilities	System Operations	16	12	2	1	31
Instrumentation		1	3		3	7
Construction 3 2 1 6 6	Meter Shop		8			8
Operations Exec Admin					1	
Total Other Operations 20		3	2	1	_	
OPERATIONS TOTALS 173 132 44 9 358 Tech Ops -GIS - Maps 3 1 1 5 Engineering 3 3 0 3 9 Total Tech Ops 6 4 1 3 9 Dispatch 12 12 12 12 Scheduling 3 3 1 7 4 Data Entry 4 4 3 1 7 4 Supports Ops Admin 2 1 1 4 4 1 1 2 Meter Reading 4 4 3 11 1 4 1 1 27 Meter Reading 4 4 4 3 11 1 2 1 1 4 4 3 11 1 2 2 1 4 4 3 11 1 2 2 4 4 3 13 1	· · · · · · · · · · · · · · · · · · ·					
Tech Ops -GIS - Maps 3 1 1 5 Engineering 3 3 0 3 9 Total Tech Ops 6 4 1 3 14 Dispatch 12 12 12 12 Scheduling 3 3 1 7 Data Entry 4 4 1 1 4 Support Ops Admin 2 1 1 1 4 Total Support Operations 21 4 1 1 2 Meter Reading 4 4 4 3 11 1 2 Meter Reading 4 4 4 3 11 1 2 President & Regulatory Affairs 0 1 5 6 6 4 3 <td>Total Other Operations</td> <td>20</td> <td>25</td> <td>3</td> <td>8</td> <td>56</td>	Total Other Operations	20	25	3	8	56
Total Tech Ops	OPERATIONS TOTALS	173	132	44	9	358
Total Tech Ops	Tech Ops -GIS - Maps	3	1	1		5
Dispatch 12 12 Scheduling 3 3 1 7 Data Entry 4 3 1 7 Supports Ops Admin 2 1 1 4 Total Support Operations 21 4 1 1 27 Meter Reading 4 4 3 11 1 27 Meter Reading 4 4 3 11 1 27 Meter Reading 4 4 3 11 1 27 Meter Reading 4 4 4 3 11 1 27 Meter Reading 6 6 4 3 14 1 1 1 1 1 1 <td< td=""><td>·</td><td></td><td>3</td><td>0</td><td>3</td><td></td></td<>	·		3	0	3	
Scheduling 3 3 3 1 7 7 7 7 7 7 7 7 7	Total Tech Ops	6	4	1	3	14
Scheduling 3 3 3 1 7 7 7 7 7 7 7 7 7	Dienatch	12				12
Data Entry	•		3	1		
Supports Ops Admin			J	•		
Total Support Operations 21 4 1 1 27 Meter Reading Field Collections 6 4 3 11 Field Collections 6 4 3 13 Total Meter to Cash 10 8 6 0 24 President & Regulatory Affairs 0 1 5 6 6 0 24 Communications 1 1 1 2 2 2 2 1 1 1 2 2 2 1 1 1 1 2 2 2 1 1 1 1 2 2 2 1		2	1		1	
Field Collections		21	4	1	1	27
Field Collections	Motor Pooding	4	4	2		11
Total Meter to Cash 10 8 6 0 24 President & Regulatory Affairs 0 1 5 6 Communications 1 1 2 2 CARES 0 1 1 1 1 DSM 0 3 3 3 3 3 3 3 3 3 3 3 3 3 3 1 9 12 21 21 21 21 21 21 21 21 21 21 21 21 21 21 21 21 21 21 22 21 21 21 21 21 21 21 22 21 21 21 22 21 22 22 3 3 3 1 3 3 3 3 1 3 3 3 3 3 3 3 3 3 3 3 3 3			_			
President & Regulatory Affairs 0 1 5 6 Communications 1 1 2 CARES 0 1 1 DSM 0 3 3 Total President & Staff 1 1 1 9 12 Call Center 61 61 61 61 61 61 81 82 21 22 21 21 21 22 31 3	_				0	
Communications 1 1 2 CARES 0 1 1 DSM 0 3 3 Total President & Staff 1 1 1 9 12 Call Center 61 1 9 12 Call Center 61 61 61 Billing 21 21 21 Revenue Recovery 9 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 5 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 Total Other 35 82 2 1 120						
CARES DSM 0 1 1 1 DSM 0 3 3 3 Total Other 0 3 3 3 Total President & Staff 1 1 9 12 Call Center 61 61 61 Billing 21 21 21 Revenue Recovery 9 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 5 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 Total Other 35 82 2 1 120	President & Regulatory Affairs	0		1	5	
DSM 0 3 3 Total President & Staff 1 1 1 9 12 Call Center 61 61 61 Billing 21 21 21 Revenue Recovery 9 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 12 1 1 Stores 4 4 2 10 1		1	1			2
Total President & Staff 1 1 1 9 12 Call Center 61 61 61 Billing 21 21 21 Revenue Recovery 9 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 12 1 1 Stores 4 4 2 10 1 Energy Supply 1 1 1 1 Human Resources 35 82 2 1 120						
Call Center 61 61 Billing 21 21 Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1						3
Billing 21 21 Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0	Total President & Staff	1	1	1	9	12
Billing 21 21 Revenue Recovery 9 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0	Call Center		61			61
Revenue Recovery 9 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0		21	•			
NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0 Total Other 35 82 2 1 120	•		9			
Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0 Total Other 35 82 2 1 120	-	3	1		1	
Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 Total Other 35 82 2 1 120	Sales Key Accounts		1			1
Energy Supply 1 1 1 Human Resources Total Other 35 82 2 1 120	Fleet		5			
Human Resources 0 Total Other 35 82 2 1 120		4	4	2		
Total Other 35 82 2 1 120			1			
						
TOTAL LOCATION 246 231 55 23 555	Total Other_	35	82	2	1	120
	TOTAL LOCATION	246	231	55	23	555

Bay State Gas Company Full Time Staffing Levels by Division As of December 31, 2005

Distribution 77		Brockton	Springfield	Lawrence	Westboro	Total MA
Meter	Distribution	77	55	12		144
Admin						55
Northern Management 153 105 40 1 299	Customer Service	56	26	14		96
System Operations	Admin	1	1	1	1	4
System Operations						
Facilities	Total Field Operations	153	105	40	1	299
Facilities	System Operations	16	12	3	1	32
Instrumentation				_		
Construction 3 2 1 6 6	Meter Shop		7			7
Communications Comm	Instrumentation				1	1
Total Other Operations 20	Construction	3	2	1		
OPERATIONS TOTALS 173 129 44 9 355 Tech Ops -GIS - Maps 3 1 1 5 Engineering 3 3 3 9 Total Tech Ops 6 4 1 3 14 Dispatch 12 12 12 12 12 12 12 12 14 3 11 1 5 1 1 28 1 1 5 1 1 28 1 1 1 28 1 1 1 28 1 1 1 28 1 1 1 28 1 1 1 2 1 1 1 2 1 1 1 1 1 1 </td <td>•</td> <td></td> <td></td> <td></td> <td></td> <td></td>	•					
Tech Ops -GIS - Maps	Total Other Operations	20	24	4	8	<u>56</u>
Total Tech Ops	OPERATIONS TOTALS	173	129	44	9	355
Total Tech Ops	Tech Ops -GIS - Maps	3	1	1		5
Total Tech Ops				•	3	
Scheduling 3				1		
Scheduling 3	Diametel	40				40
Data Entry 4 4 Supports Ops Admin 2 2 1 5 Total Support Operations 21 5 1 1 28 Meter Reading 4 4 3 11 1 28 Meter Reading 4 4 4 3 11 1 28 1 1 1 28 1 1 1 28 1 1 1 28 1 1 1 28 1 1 1 2 6 3 3 1 1 2 2 3 3 1 1 2 3 3 1 1 2 2 6 0 23 3 1 1 1 2 2 6 0 23 3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			2	4		
Supports Ops Admin			3	I		
Total Support Operations 21 5 1 1 28 Meter Reading 4 4 4 3 11 Field Collections 6 3 3 12 Total Meter to Cash 10 7 6 0 23 President & Regulatory Affairs 0 1 5 6 6 0 23 CARES 0 1 1 2 2 2 2 1	•		2		1	
Meter Reading 4 4 3 11 Field Collections 6 3 3 12 Total Meter to Cash 10 7 6 0 23 President & Regulatory Affairs 0 1 5 6 Communications 1 1 2 2 CARES 0 1 1 1 1 DSM 0 3 3 3 3 Total President & Staff 1 1 1 9 12 Call Center 62 62 62 62 Billing 21 21 21 Revenue Recovery 7 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 5 Fleet 7 5 12 1 Stores 4 4 2 10 Energy Supply 1 1 1 <t< td=""><td></td><td></td><td></td><td>1</td><td></td><td>28</td></t<>				1		28
Field Collections 6 3 3 12 Total Meter to Cash 10 7 6 0 23 President & Regulatory Affairs 0 1 5 6 Communications 1 1 1 2 CARES 0 1 1 1 DSM 0 3 3 3 Total President & Staff 1 1 1 9 12 Call Center 62 62 62 62 62 Billing 21 21 21 21 21 21 21 21 21 21 21 3 3 3 1 1 5 5 3 3 1 1 5 5 3 3 1 1 5 5 3 3 1 1 1 5 5 3 3 1 1 1 5 5 3 1 1 1	- Clair Cuppert Operations			-		
Total Meter to Cash 10 7 6 0 23 President & Regulatory Affairs 0 1 5 6 Communications 1 1 2 CARES 0 1 1 1 DSM 0 3 3 3 Total President & Staff 1 1 1 9 12 Call Center 62 62 62 62 Billing 21 21 21 21 Revenue Recovery 7 7 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 5 Slees Key Accounts 7 5 12 1 Stores 4 4 2 10 1 Energy Supply 1 1 1 1 1 1 Human Resources 7 35 81 2 1 119 <td></td> <td>4</td> <td>4</td> <td></td> <td></td> <td></td>		4	4			
President & Regulatory Affairs 0 1 5 6 Communications 1 1 2 CARES 0 1 1 DSM 0 3 3 Total President & Staff 1 1 1 9 12 Call Center 62 62 62 62 81 22 21 22 32 33 3						
Communications 1 1 2 CARES 0 1 1 DSM 0 3 3 Total President & Staff 1 1 1 9 12 Call Center 62 62 62 Billing 21 21 21 Revenue Recovery 7 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 12 1 Stores 4 4 4 2 10 Energy Supply 1 1 1 1 Human Resources 7 35 81 2 1 119	Total Meter to Cash_	10	7	6	0	23
Communications 1 1 2 CARES 0 1 1 DSM 0 3 3 Total President & Staff 1 1 1 9 12 Call Center 62 62 62 Billing 21 21 21 Revenue Recovery 7 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 12 1 Stores 4 4 4 2 10 Energy Supply 1 1 1 1 Human Resources 7 35 81 2 1 119	President & Regulatory Affairs	0		1	5	6
DSM 0 3 3 Total President & Staff 1 1 1 9 12 Call Center 62 62 62 Billing 21 21 21 Revenue Recovery 7 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 12 1 1 Stores 4 4 2 10 1		1	1			
Call Center 62 62 Billing 21 21 Revenue Recovery 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 1 Fleet 7 5 12 1 1 Stores 4 4 2 10 1	CARES	0			1	1
Call Center 62 62 Billing 21 21 Revenue Recovery 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1						3
Billing 21 21 Revenue Recovery 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1	Total President & Staff	1	1	1	9	12
Billing 21 21 Revenue Recovery 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1	Call Center		62			62
Revenue Recovery 7 7 NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 1 1 Fleet 7 5 12 12 1		21	<u>-</u>			
NE Retail & Sales Svcs 3 1 1 5 Sales Key Accounts 1 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0			7			
Sales Key Accounts 1 1 Fleet 7 5 12 Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 0 Total Other 35 81 2 1 119		3	1		1	
Stores 4 4 2 10 Energy Supply 1 1 1 Human Resources 0 0 Total Other 35 81 2 1 119	Sales Key Accounts		1			1
Energy Supply Human Resources Total Other 35 81 2 1 119	Fleet	7	5			12
Human Resources 0 Total Other 35 81 2 1 119		4	4	2		10
Total Other 35 81 2 1 119			1			
	_					
TOTAL LOCATION 246 227 55 23 551	Total Other_	35	81	2	1	119
	TOTAL LOCATION	246	227	55	23	551